

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

APPLE INC.,

*Plaintiff,*

v.

MASIMO CORPORATION and  
SOUND UNITED, LLC,

*Defendants.*

Civil Action No.

**JURY TRIAL DEMANDED**

**PLAINTIFF APPLE INC.’S MOTION FOR EXPEDITED DISCOVERY**

Plaintiff Apple Inc. (“Apple”) moves for leave to serve expedited discovery on Defendants Masimo Corporation (“Masimo”) and Sound United, LLC (“Sound United”) (together, “Defendants”). Apple seeks limited expedited discovery relevant to its potential motion for a preliminary injunction against Defendants’ W1 watch, which infringes Apple’s U.S. Patent Nos. D735,131, D883,279, D947,842, and D962,936. In support of the instant motion for expedited discovery, Apple submits the following:

- Apple’s Opening Brief In Support of Its Motion for Expedited Discovery;
- The Declaration of Peter C. Magic in Support of Apple’s Motion for Expedited Discovery, and all exhibits attached thereto (Exhibits A-Q);
- The discovery sought under the instant motion, including two requests for production (Exhibit 1), two interrogatories (Exhibit 2) and two Fed. R. Civ. P. 30(b)(6) topics (Exhibit 3); and
- A proposed order.

Apple respectfully requests the Court to grant this motion and order expedited discovery as further described in Apple’s opening brief.

Dated: October 20, 2022

Respectfully submitted,

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